

**Sutter County Environmental Health
Certified Unified Program Agency
1130 Civic Center Blvd.
Yuba City, CA 95993
(530) 822-7400**

Deficiency Status Report 1

1. **Deficiency:** CUPA has not conducted its self-audit for the last fiscal year.

CUPA Corrective Action: On September 25, 2006, CUPA has mailed self-audit for fiscal year 2005-06 to Cal EPA.

2. **Deficiency:** (a) CUPA is not meeting inspections frequencies.

(b) CUPA is not implementing Enforcement Plan.

CUPA Corrective Action: (a) On September 19, 2006, we hired a full time CUPA inspector who is a Registered Environmental Health Specialist. This new CUPA inspector has started doing full time CUPA inspections.

(b) CUPA will start working on developing Administrative Enforcement Order (AEO) within next couple of months.

3. **Deficiency:** CUPA has not performed an annual CalARP audit.

CUPA Corrective Action: CUPA has completed the CalARP audit in the self-audit report for fiscal year 2005-06.

4. **Deficiency:** CUPA has not met the inspection frequency for Business Plan Program.

CUPA Corrective Action: Please see CUPA corrective action 2 (a).

5. **Deficiency:** CUPA has not met the inspection frequency for the CalARP program.

CUPA Corrective Action: Please see CUPA corrective action 2 (a).

6. **Deficiency:** The CUPA does not have a CalARP dispute resolution procedure.

CUPA Corrective Action: CUPA will develop CalARP dispute resolution procedure by the end of this fiscal year.

7. **Deficiency:** CUPA's area plan has not been revised in the past three years.

CUPA Corrective Action: CUPA will apply for a grant to develop Area Plan, to State Office of Emergency Services this fiscal year.

8. **Deficiency:** CUPA has not ensured that inventories or annual inventory certifications are current.

CUPA Corrective Action: CUPA has been sending blank certification forms along with annual invoices to the businesses as a reminder of annual inventory submission requirement. CUPA will make sure during our routine inspections that businesses are submitting this information on a regular basis as required by the law.

9. **Deficiency:** CUPA is not obtaining business plans from all businesses subject to the business plan program.

CUPA Corrective Action: CUPA provides business plan forms to all the businesses that are being identified under this regulation. In July, 2006, CUPA sent letters indicating CUPA requirements along with blank business plan forms to approximately 1200 farmers. Response from the businesses was very good.

10. **Deficiency:** CUPA is not meeting hazardous waste generator inspection frequencies.

CUPA Corrective Action: Please see CUPA corrective action 2 (a).

11. **Deficiency:** CUPA did not conduct a complete oversight inspection.

CUPA Corrective Action: CUPA has sent a notice to the business owners requiring them to provide a written tank assessment (including secondary containment) by an independent qualified engineer registered in California.